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19 CONTRA COSTA COUNTY

20 **UNITED STATES DISTRICT COURT**

21 **NORTHERN DISTRICT OF CALIFORNIA**

22
23 RETIREE SUPPORT GROUP OF CONTRA
COSTA COUNTY,

24 Plaintiff,

25 v.

26 CONTRA COSTA COUNTY,

27 Defendant.
28

CASE NO. C 12-00944 JST

**STIPULATION EXTENDING CASE
DEADLINES AND ~~PROPOSED~~ ORDER**

Judge: Hon. Jon S. Tigar

1 1. The current Scheduling Orders provide the indicated case deadlines (Dkts. 91 and 97);

2 2. The parties have engaged in substantial discovery and there still remains a significant
3 amount of discovery to be completed before this case is ready for trial;

4 3. Plaintiff Retiree Support Group of Contra Costa County ("RSG") and Defendant Contra
5 Costa County (the "County") (collectively the "Parties") are currently exploring alternative
6 dispute resolution ("ADR") options in advance of the ADR conference scheduled for March 10,
7 2015;

8 4. The Parties wish to postpone for two weeks imminent discovery deadlines to allow the
9 Parties additional time to explore engaging in an ADR process which would be complex and time
10 consuming given the nature of this case;

11 5. Depending on further discussions, after the two week continuance, the Parties may
12 request an additional continuance of case deadlines and the trial date for approximately six months
13 to allow the Parties additional time to explore settlement through an alternative dispute resolution
14 procedure.;

15 The Parties, by and through their respective counsel of record, hereby stipulate and agree
16 that there is good cause to continue all case deadlines as follows pursuant to Federal Rule of Civil
17 Procedure 16 and Civil Local Rule 16-10 and request the Court approve and so order:

Event	Deadline
Fact discovery cut-off	3/20/15 to 4/3/15
Expert disclosures	2/23/15 to 3/9/15
Expert rebuttal	3/12/15 to 3/26/15
Expert discovery cut-off	4/9/15 to 4/23/15

23 ///

24 ///

25 ///

26 ///

27 **IT IS SO STIPULATED.**

1 DATED: February 18, 2015

LEWIS, FEINBERG, LEE, RENAKER &
JACKSON, P.C.

3 /s/ Andrew Lah

4 By: _____

ANDREW LAH

Attorneys for Plaintiff

RETIREE SUPPORT GROUP OF CONTRA
COSTA COUNTY

7 DATED: February 18, 2015

HANSON BRIDGETT LLP

9 By: /s/ Raymond F. Lynch

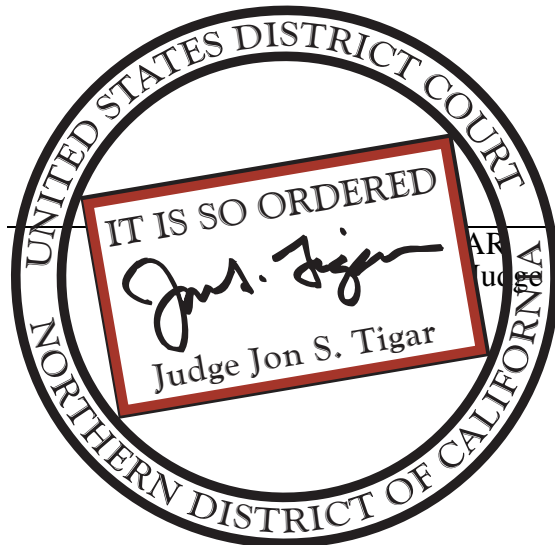
RAYMOND F. LYNCH

Attorneys for Defendant

CONTRA COSTA COUNTY

13 **IT IS SO ORDERED.**

14 Dated: February 20, 2015



SIGNATURES UNDER GENERAL ORDER NO. 45

Pursuant to General Order No. 45 of the United States District Court, Northern District of California, I, Raymond F. Lynch—the ECF User whose User ID and Password are used in the filing of this document—hereby attests that the concurrence to the filing of this document has been obtained from each of the other signatories to this document.

/s/ Raymond F. Lynch

Raymond F. Lynch